

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

PETER S. CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
pete@christiansenlaw.com
KENDELEE L. WORKS, ESQ.
Nevada Bar No. 9611
kworks@christiansenlaw.com
CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 240-7979
Fax: (866) 412-6992
Attorneys for Defendant Leslie Kalyn

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LESLIE KALYN, aka
Leslie Feth,

Defendant.

Case No. 2:18-cr-00169-JCM-NJK-3

**STIPULATION TO CONTINUE
CHANGE OF PLEA HEARING (FIRST
REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Nicholas A. Trutanich, United States Attorney, and Peter S. Levitt, Assistant United States Attorney, Defendant, Leslie Kalyn, by and through her attorneys, Peter S. Christiansen and Kendelea L. Works, that the Change of Plea hearing currently scheduled for June 12, 2020 be continued to a date and time convenient to the Court, but no earlier than July 1, 2020.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. Due to the COVID-19 outbreak and stay at home orders in the State of Nevada, Defense Counsel's law firm attorneys and staff have been working remotely since mid-March 2020 and are only recently integrating back into the office.

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**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defense counsel's conflicting trial schedule, including a capital murder case, and illness of supporting associates have precluded defense counsel from dedicating sufficient time in preparation for pretrial motions in this matter.

2. Defense counsel has spoken to AUSA Nadia Ahmed and she is in agreement with the requested continuance.

3. Defendant Leslie Kalyn is presently out of custody and has no objection to the requested continuance.

4. The additional time requested herein is not sought for purposes of delay.

5. Denial of this request for continuance would deny counsel for Defendant Leslie Kalyn sufficient time to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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7. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code §§ 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

The ends of justice served by granting said continuance outweigh the interests of the public and the defense in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

DATED AND DONE this day of , 2020.